Bult *et al*. Appl. No. 10/649,808 Atty. Docket: 1875.0510002

## Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-20 are pending in the application, with claims 1, 7, 13, 15, 17, and 18 being the independent claims. Claims 13 and 15 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections Under 35 U.S.C. § 102

#### Kim

The Office Action rejected claims 13 and 14 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,281,713 to Kim (hereinafter "Kim"). (See, Office Action at p. 2.) Applicants traverse these rejections.

Amended independent claim 13 recites (emphasis added):

A reset circuit for a latch circuit having a bistable pair of transistors connected to a supply voltage, the reset circuit comprising:

a first transistor connected to the supply voltage;

a second transistor connected between said first transistor and a first port of the latch circuit, wherein a gate terminal of said second transistor is connected to a drain terminal of said second transistor at said first port; and

a third transistor connected between said first transistor and a second port of the latch circuit, wherein a gate terminal of said third

Bult *et al.* Appl. No. 10/649,808 Atty. Docket: 1875.0510002

transistor is connected to a drain terminal of said third transistor at said second port;

wherein transistors of said latch circuit, said first transistor, said second transistor, and said third transistor are all characterized by a common channel type, said common channel type being one of a p-channel type and a n-channel type.

Kim does not disclose, teach, or suggest a reset circuit for a latch circuit in which the transistors of the latch circuit are of the same channel type as the three transistors of the reset circuit. Therefore, Kim does not anticipate claim 13. Likewise, claim 14, which depends directly from claim 13, is not anticipated by Kim. Claim 14 is also allowable because of its additional distinctive features. Accordingly, Applicants respectfully request that the Examiner reconsider and remove his rejections of claims 13 and 14 under 35 U.S.C. § 102(e) with respect to Kim.

### Varadarajan

The Office Action rejected claims 15 and 16 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,963,060 to Varadarajan *et al.* (hereinafter "Varadarajan"). (*See*, Office Action at p. 3.) Applicants traverse these rejections.

Amended independent claim 15 recites (emphasis added):

An analog-to-digital converter, comprising:

a comparator having a first input for receiving an analog signal and a second input for receiving a reference signal, said comparator for producing a digital signal;

wherein said comparator comprises a latch circuit having a bistable pair of transistors coupled between a reset circuit and a first supply voltage, and a vertical latch coupled between said first supply voltage and a second supply voltage and coupled to said bistable pair of transistors, said vertical latch having a first transistor and a second transistor, said first transistor being of a first channel type, said second transistor being of a second channel type, said first channel type being one of a p-channel type and a n-channel type, said second channel type being different from said first channel type.

Varadarajan does not disclose, teach, or suggest a vertical latch having a first transistor of a first channel type and a second transistor of a second channel type in which the second channel type is different from the first channel type. Therefore, Varadarajan does not anticipate claim 15. Likewise, claim 16, which depends directly from claim 15, is not anticipated by Varadarajan. Claim 16 is also allowable because of its additional distinctive features. Accordingly, Applicants respectfully request that the Examiner reconsider and remove his rejections of claims 15 and 16 under 35 U.S.C. § 102(b) with respect to Varadarajan.

# Allowable Subject Matter

The Office Action indicates that "[c]laims 1-12 and 17-20 are presently allowed." (Office Action at p. 3.)

## Conclusion

All of the stated grounds rejection have been properly traversed. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Bult *et al.*Appl. No. 10/649,808
Atty. Docket: 1875.0510002

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Timothy A. Doyle
Attorney for Applicants
Registration No. 51,262

Date: 7 MAROS

1100 New York Avenue, N.W. Washington, D.C. 20005-3934 (202) 371-2600

346982\_1.DOC